

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

OSCAR GABRIEL ROJAS URQUIETA

a/k/a Oscar Gabriel Versace

a/k/a DJ Raffy

Criminal No. 17-9 Erie

(18 U.S.C. § 2261A(2)(A) & (B))

**INDICTMENT**

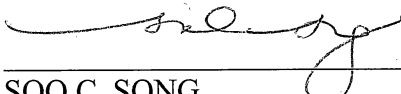
The grand jury charges:

From in and around May 2016, to in and around February 2017, in the Western District of Pennsylvania, and elsewhere, the defendant, OSCAR GABRIEL ROJAS URQUIETA, also known as Oscar Gabriel Versace and DJ Raffy, with the intent to kill, injure, harass and intimidate, used any interactive computer service or electronic communication service or electronic communication system of interstate commerce or any other facility of interstate or foreign commerce, to wit, e-mail and social media, to engage in a course of conduct that placed C.D. in reasonable fear of death or serious bodily injury and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to C.D.

In violation of Title 18, United States Code, Section 2261A(2)(A) & (B).

A True Bill,

  
FOREPERSON

  
SOO C. SONG  
Acting United States Attorney  
DC ID No. 457268